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August 20, 2019

Michael R. Cogan, Chairman
Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, MD 21401-0486

RE: Elimination of Ballot Stubs

Dear Chairman Cogan and Members of the State Board of Elections:

The Montgomery County Board of Elections requests that the State Board support the proposed amendments by the Maryland Association of Election Officials to COMAR 33.10.01.17 that would eliminate the requirement for ballot stubs. This change is about improving service to our voters by creating greater efficiency on Election Day. Ballot stubs hinder the ballot issuing process, often cause scanner malfunctions and contribute to long lines at the polling place. Adoption of the proposed change would streamline polling place operations and lead to a more pleasant experience for all voters on Election Day.

This Board recognizes the need for smart regulations to ensure accurate, secure and transparent elections, but the existing regulation requiring ballot stubs does not promote this goal. Instead, the stubs, which only exist due to this regulatory requirement, require election judges to painstakingly remove each ballot. This causes delays in the distribution of ballots to voters. In addition, the ballot stubs create two scanning problems. First, election judges sometimes tear the ballots while attempting to remove the ballot from the ballot stub. Depending upon the severity of the tear, it can impact the timing marks on the ballot and make the ballot unreadable by the scanner. Naturally, this can lead to the voter's frustration after having received and completed his or her ballot, only to be told that the ballot needs to be spoiled and another ballot completed because the scanner will not accept the ballot. Second, the perforation creates paper dust and can contribute to causing the scanners to malfunction.

Of course, the Board will continue to fully execute all legislative, regulatory and State Board policies related to ballot accountability without the ballot stubs.

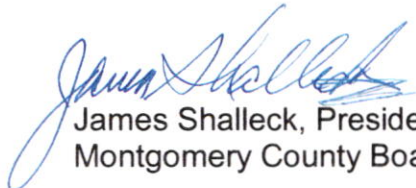
18753 North Frederick Avenue, Suite 210 • Gaithersburg, Maryland 20879
240-777-8500 • MD Relay 1-800-735-2258 • FAX 240-777-8505
elections@montgomerycountymd.gov • www.777vote.org

As you may know, in the 2018 General Election, there was a perforation issue with some of the ballots that were delivered to the Montgomery County Board of Elections. With the State's permission, the ballot stubs were removed so that those ballots could be utilized for the General Election. Our election judges observed firsthand the greater efficiency in handing out ballots when the judges did not need to remove the ballots from the ballot stubs. In addition, we experienced no difficulty accounting for each and every ballot without the ballot stubs.

Finally, we request that Director Jurgensen or her designee be provided the opportunity to address the State Board at the next meeting on August 22, 2019 to present the lessons we learned in 2018, including the advantages of eliminating the ballot stubs and alternate ballot packaging.

If you have any questions, feel free to contact me directly or contact Margaret Jurgensen, Election Director at 240.777.8523.

Sincerely,



James Shalleck, President
Montgomery County Board of Elections

Enclosure

cc: Patrick J. Hogan
Kelley A. Howell
Malcolm Funn
William G. Voelp

All members of the MC Board of Elections